

Keith Allen - #M21830,
Plaintiff,

No. 23-cv-3775-DWD

Wexford Health Sources, Inc., et al.
Defendants.

"Subpoena To Produce Documents, Information, or Objects, OR To Permit Inspection Of Premises In A Civil Action"

To: IDOC - Menard Correctional Center, Attn: Medical Record Officer Supervisor, 711 Kaskaskia Street, Menard, IL 62259.

YOU ARE COMMANDED pursuant to Fed. R. Civ. P. 45, to mail the following documents in your possession or control, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material to the place, at the time, and date set forth below:

Keith Allen, # M21830, Menard Correctional Center, P.O. Box 1000, Menard, IL 62259, on or by _____, at _____.

(This is for records only, there will be no oral interrogatories):

Any and all imaging studies and related records concerning Keith Allen - # M21830 (D.O.B. 6/04/88) from March 16, 2021 through August 5, 2024, related to treatment or diagnosis of hand injuries, including but not limited to:

- X-ray films, images, and diagrams
- Ultrasound images (if any)
- CT scans
- Radiology Reports and interpretations
- MRI scans
- Any Other diagnostic imaging of the hands
- Radiographic Studies
- Email messages, faxes, notes, logs, between medical personnel regarding medical care for Keith Allen - M21830 from 3/1/21 to 9/1/24.
- IDOC's Negotiated Health Services Contract, between them and Wexford Health Sources, Inc.

You Failure provisions of Fed.R.Civ.P. 45 are attached - Rule 45(e), relating to the place of compliance; Rule 45(f), relating to your protection as a person subject to a Subpoena; and Rule 45(c) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

Clerk Of Court

Signature of Clerk or Deputy Clerk

OR Keith Allen - # M21830
Pro Se - Plaintiff

The name and address of the party who issues or requests this Subpoena, are:

Keith Allen - #121830
Menard Correctional Center
P.O. Box 1000
Menard, IL 62259

/S/ Keith Allen
Pro Se - Plaintiff

"Notice to the person who issues or requests this Subpoena"

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45 (a)(4).

Keith Allen - #M21830,
Plaintiff,

V.
Wexford Health Sources, Inc., et al.
Defendants.

No. 23-cv-3775-DWD

"Subpoena To Produce Documents, Information, Or Objects, Or To Permit Inspection of Premises In A Civil Action"

To : The Orthopaedic Institute OF Southern Illinois, Attn: Medical Record Officer Supervisor; and/or Glen S. Babich (MD), 510 Lincoln Drive, Herrin, IL. 62948-6334.

You ARE COMMANDED pursuant to Fed. R. Civ. P. 45, to mail the following documents in your possession or control, electronically stored information, or objects to : Keith Allen - # M21830, Menard Correctional Center, P.O. Box 1000, Menard, IL. 62259, on or by _____, at _____.

(This is for records only, there will be no oral interrogatories.)

Any and all imaging studies and related records concerning Keith Allen - # M21830 (O.O.B. 6/04/88) from March 1, 2022 through August 5, 2024, related to treatment or diagnosis of hand injuries including but not limited to :

X-ray films, images, and diagrams; CT scans, MRI Scans; Radiographic Studies, Ultrasound images (if any); Radiology reports and interpretations; Any other diagnostic imaging of the hands, all consultant and procedure notes, lab work, treatment plans, charts, Surgery records, schedules of medical visits and Medical Furloughs transfers, referrals, physician recommendations, follow-up treatment records, scheduled medical appointments, all medical records, issued medical devices like hand splints, hand braces, physical therapy, diagnosis reports and records, and all electronically stored information and all medical related correspondences pertaining to inmate Keith Allen M21830 medical care and treatment between "The Orthopaedic Institute OF Southern Illinois", Menard Correctional Center medical staff, Wexford Health Sources, Inc, and University of Illinois Hospital And Health Science System (UI Health/UIC), in the form of fax, email messages, texts, computer files, logs, social media etc, between dates ~~May~~ 1, 2021 to August 5, 2024.

Your Failure To Respond To This Subpoena Will Subject You To Punishment For Conten

- Court.

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a Subpoena; and Rule 45(c) and (g.), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

Clerk of Court

Signature of Clerk or Deputy Clerk

OR Keith Allen - # Ma1830
Pro Se - Plaintiff

The name and address of the party who issues or requests this Subpoena, are:

Keith Allen - # Ma1830
Menard Correctional Center
P.O. Box 1000
Menard, IL 62259

/s/ Keith Allen - # Ma1830
Pro Se - Plaintiff

"Notice to the person who issues or requests this subpoena"⁴

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

In The United States District Court
For The Southern District OF ILLINOIS
#2141

Keith Allen - # Ma1830,
Plaintiff,

V.
Wexford Health Sources, Inc., et al.
Defendants.

No. 23-cv-3775-DWD

"Subpoena To Produce Documents, Information, OR Objects, OR To Permit Inspection OF Premises In A Civil Action"

To : Wexford Health Sources, Inc., Foster Plaza 2, 425 Holiday Drive, Pittsburgh, PA. 15220

YOU ARE COMMANDED pursuant to Fed.R.Civ.P.45, to mail the following documents in your possession or control, electronically stored information, or objects, to : Keith Allen - # Ma1830, Menard Correctional Center, P.O.Box 1000, Menard, IL. 62259 , on or by _____ at _____
(This is for records only; there will be no oral interrogatories.)

Any and all imaging studies and related records concerning Keith Allen - # Ma1830 (D.O.B. 6/04/1988) from 16, 2021 through August 5, 2024, related to treatment or diagnosis of hand injuries, including but not limited to, And the following:

- "The Wexford Health Sources, Inc., 'Provider Handbook' (Approved by the Wexford Medical Advisory Committee On June 8, 2012).
- A Copy of the Negotiated Health Service Contract between Wexford Health Source, Inc., and the Illinois Department Of Corrections agreed upon in 2011, and any other later negotiated Health Service Contracts thereafter to the current date.
- A Copy of the American Correctional Association (ACA) Standards, which Wexford claims to have met and operates under.
- A Copy of the "National Commission of Correctional Health Care (NCCHC) Standards, which Wexford Health Sources, Inc. claims that wherever it assumes responsibility for medical care management, a concerted effort is made to meet and exceed the Standards for Medical Care in Prisons and Jails as established by the National Commission of Correctional Health Care, that Wexford claims to have met and operates under.
- A copy of Wexford Health Source, Inc's Medical Protocols, "SOAP" Charts;
- Any and all electronically stored correspondence such as log, fax, email messages between Wexford Health -

-Source, Inc., and Menard Correctional Center Medical Personnel, Medical Doctor's N. Florence and N. Yonsef, and any other outside medical provider's pertaining to the medical care and treatment of Keith Allen - #M21830 between dates March 1, 2021 to October 1, 2024.

• A copy of any and all documents of Wexford Health Sources, Inc. sub-contracting or employing Radiologists - Medical Doctors, N. Florence and N. Yonsef for a company named "One Radiology", address: Normal, IL 61761 to conduct reviews of inmates at Menard C.C. X-ray films.

Your Failure To Respond To This Subpoena Will Subject You To Punishment For Contempt Of This Court.

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

Clerk of Court

Signature of Clerk or Deputy Clerk

OR Keith Allen - #M21830
Pro Se - Plaintiff

The name and address of the party who issues or requests this Subpoena, are: Keith Allen - #M21830, Menard Correctional Center, P.O. Box 1000, Menard, IL 62259. /S/ Keith Allen - #M21830
Pro Se - Plaintiff

"Notice to the person who issues or requests this Subpoena"

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed.R.Civ.P. 45(a)(y).

UNITED STATES DISTRICT COURT
#2143
FOR THE
SOUTHERN DISTRICT OF ILLINOIS

Keith Allen - #M21830
Plaintiff,

v.

Nexford Health Sources, Inc., et al.
Defendant.

Civil Action No. 23-cv-03775-DWD

"Subpoena To Produce Documents, Information, or Objects, or To Permit Inspection of Premises In A Civil Action"

To : Menard Correctional Center, Litigation Coordinator, 711 East Kaskaskia Street, Menard, IL 62259

Production: You ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: "See Attached Exhibit A".

Place: Keith Allen - #M21830
Menard Correctional Center
P.O. Box 1000
Menard, IL 62259

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(e), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date:

Clerk of Court

Signature of Clerk or Deputy Clerk

OR

Keith Allen - #M21830
pro se - Plaintiff

The name and address of the party who issues or requests this Subpoena, are:

Keith Allen - #M21830, Menard Correctional Center, P.O. Box 1000, Menard, IL 62259

"Notice To The Person Who Issues or Requests This Subpoena"

IF this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the Subpoena must be served on each party in the case before it is served on the person to whom it is directed. Fed.R.Civ.P. 45(e)(4).

To: Litigation Coordinator
Menard Correctional Center
711 E. Kaskaskia Street
Menard, IL 62259

Name of Inmate: Keith Allen #M21830

Please provide any and all documents, including but not limited to:

"Medical Records" - All medical records of Keith Allen-#M21830, including, but not limited to progress notes, rounds sheets, prescriptions, test results, physician orders, lab work, radiology reports, sick call requests and records from outside providers from August 1, 2021 to present, as well as all off site referral request and denials, all consultant and procedure notes, lab and X-ray film results completed, X-ray films from The Orthopaedic Institute of Southern Illinois, any and all medical related correspondences between Menard C.C. medical staff, Neford Health Sources, Inc., and outside providers in the form of email messages, fax, computer files, electronic records, procedures, and other electronically stored medical records, all medical records, reports, charts, rotations, charts, treatment plans, schedules, referrals, Med furlough transfers to and from outside medical providers-including approvals and denials, surgery records, physical therapy records, medical devices like hand splints, hand braces, physician recommendations, follow-up treatment records, scheduled medical appointments, ~~all these~~ medical records between dates August 1, 2021 to October 1, 2024, and any other medical documents (as defined above) pertaining to General Hospital treatment, The Orthopaedic Institute of Southern Illinois, and care of Keith Allen-#M21830.

"Counseling Records" - The case History Management (CHIPS) summary, formerly known as the cumulative counseling summary of Keith Allen-#M21830.

"Inmate Movement Records" - The Inmate Movement History Report for Keith Allen-#M21830.

"Inmate Orientation Handbook" - The current inmate Orientation Handbook for Keith Allen-#M-830.

"Grievance Records" - All grievances, grievance logs, emergency grievance logs and related documents relating to Keith Allen-#M21830 and any and all grievance officer decisions, decisions of the Administrative Review Board and Director from August 1, 2021 to the present. Grievance logs requested are to include both logged and processed, and any other entry referring to the named inmate.

"Certification #2145 To Records"

To: Menard Correctional Center
Medical Records Unit
711 E. Kaskaskia Street
Menard, IL 62259

Name of Inmate: Keith Allen - # M21830

Records Requested: All medical records of Keith Allen - # M21830, from August 1, 2021 until the present involving the care and treatment provided to inmate.

Case: Keith Allen - # M21830 v. Wexford Health Sources, Inc., et al. 23-cv-03775-DWD.

The enclosed subpoena does not require you to appear in person. The subpoena does, however, require that all records specified in the subpoena be provided.

- Records must be received no later than [REDACTED].
- Sign below and include this statement with records.
- Submit records to: Keith Allen - # M21830, Menard Correctional Center, P.O. Box 1000, Menard IL 62259.

"Certification That Records Provided"

In response to the subpoena issued, I hereby certify, under penalties as provided by law pursuant to § 1-109 of the Illinois Code of Civil Procedure (735 ILCS 5/2-109), that the attached are true and correct copies of the only records in our possession or control.

Date

Records Custodian, Medical Records Unit

"Certification That There Are No Records"

In response to the subpoena issued, I hereby certify, under penalties as provided by law pursuant to § 1-109 of the Illinois Code of Civil Procedure (735 ILCS 5/2-109), that a thorough and diligent search of our files was made and I find there are no records.

Date

Records Custodian, Medical Records Unit

Certification ID#2146 To Records"

To: Menard Correctional Center
 Litigation Coordinator
 711 E. Kaskaskia Street
 Menard, IL. 62259

Name of Inmate: Keith Allen - # M21830

Records Requested: All grievance records, counseling records, inmate movement records, and inmate orientation handbook of Keith Allen - # M21830, from August 1, 2021 until the present involving the care and treatment provided to inmate.

Case: Keith Allen - # M21830 v. Wexford Health Sources, Inc., et al.

The enclosed subpoena does not require you to appear in person. The subpoena does, however, require that all records specified in the subpoena be provided.

- Records must be received no later than _____.
- Sign below and ~~Handwritten~~ include this statement with records.
- Submit records to: Keith Allen - # M21830, Menard Correctional Center, P.O. Box 1000, Menard IL. 62259.

"Certification That Records Provided"

In response to the subpoena issued, I hereby certify, under penalties as provided by law pursuant to § 1-109 of the Illinois Code of Civil Procedure (735 ILCS 5/2-109), that the attached are true and correct copies of the only records in our possession or control.

Date

Records Custodian, Litigation Coordinator

"Certification That There Are No Records"

In response to the subpoena issued, I hereby certify, under penalties as provided by law pursuant to § 1-109 of the Illinois Code of Civil Procedure (735 ILCS 5/2-109), that a thorough and diligent search of our files was made and I find there are no records.

Date

Records Custodian, Litigation Coordinator

In The United States District Court
For The Southern District OF Illinois

Keith Allen - #ma1830,
Plaintiff,

ID#2147

District Court

For The Southern District OF Illinois

Case No. 23-cv-3775 -DWD

Nexford Health Sources, Inc., et al.
Defendants.

"Grievance And Other Records Affidavit"

State of ILLINOIS

County of _____

I, _____, Custodian of Records for Menard Correctional Center, being first duly sworn, being of sound mind and body, capable of making this affidavit, and personally acquainted with the facts herein stated, do hereby certify the following:

1.) Attached hereto are _____ pages of records from Menard Correctional Center, regarding Keith Allen - #ma1830.

2.) These _____ pages of records are kept by Menard Correctional Center, in the regular course of business.

3.) It was the regular course of business of Menard Correctional Center, for an employee or representative of Menard Correctional Center, with knowledge of the act, event or conditions, recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time of the act, event or conditions.

4.) The records attached hereto are the original or exact duplicates of the original.

Custodian Of Records

Signed to and sworn to before me a Notary Public, this _____ day of _____, 2025.

Notary Public

(F) A. (L)

"Proof Of Service"

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this Subpoena for (name of individual and title, if any).

on (date) _____.

I served the subpoena by delivering a copy to the named person as follows:

Menard Correctional Center, Litigation Coordinator, 711 East Kaskaskia Street, Menard, IL 62259

on (date) _____ for I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents,
I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law,
in the amount of \$.

My fees are \$ _____ for travel and \$ _____ for services, for a total
of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's Signature

Printed Name and title

Server's address